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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	No. 3:20-cr-00447-MO-2
)	
Plaintiff,)	SUPPLEMENTAL DECLARATION
)	OF COUNSEL IN SUPPORT OF
vs.)	UNOPPOSED MOTION TO
)	CONTINUE TRIAL
BRIANNA PRICE-CORNELIUS,)	
)	
Defendant.)	

DECLARATION OF MATTHEW MCHENRY

Matthew McHenry, as counsel for the defendant, does swear under penalty of perjury that the following is true:

1. I am the attorney of record for the defendant in the above-captioned case, having been appointed under the Criminal Justice Act pursuant to an order filed on October 15, 2020.

2. Ms. Price-Cornelius is charged with Conspiracy, Felon in Possession of a Firearm (accomplice theory), and Making a False Statement during the Purchase of a Firearm. She is out of custody under the supervision of United States Pretrial Services.

3. I am exploring a negotiated resolution with the government. I need additional time to obtain and present mitigating and other defense-focused information to the government to further the negotiations.

4. I have conferred with AUSA Lewis Burkhart regarding this motion to continue, and the government has no objection.

5. I have conferred with my client and discussed this motion. I explained her speedy trial rights and the concepts of excludable delay under 18 U.S.C. § 3161. With respect to this motion and the time requested, Ms. Price-Cornelius waives her speedy trial rights and consents to the excludable delay under 18 U.S.C. § 3161(h) that will result with a continuance, up to the date which the Court sets for a new trial.

DATED: March 22, 2021.

/s/ Matthew McHenry
Matthew McHenry
Attorney for Brianna Price-Cornelius